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17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS MOTION TO
COMPEL RE: TRAVIS KALANICK
DEPOSITION**

23 vs.

24 UBER TECHNOLOGIES, INC.;
25 OTTOMOTTO LLC; OTTO TRUCKING
26 LLC,

27 Defendants.

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Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal information in its Motion to Compel Re: Travis Kalanick Deposition, filed concurrently herewith. Specifically, Waymo requests an order granting leave to file under seal the portions of the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Motion to Compel (“Motion”)	Highlighted in Blue	Defendants
Ex. 1 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 2 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 3 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 4 to Waymo’s Motion to Compel	Entire Document	Defendants

I. **LEGAL STANDARD**

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

II. **UBER’S CONFIDENTIAL INFORMATION**

Waymo seeks to seal the portions of Waymo’s Motion only because Defendants have designated the information confidential. Declaration of John McCauley (“McCauley Decl.”) ¶ 3. Waymo takes no position on the merits of sealing Defendants’ designated material, and expects Defendants to file one or more declarations in accordance with the Local Rules.

III. **CONCLUSION**

In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above listed documents accompany this Administrative Motion. For the foregoing reasons, Waymo respectfully requests that the Court grant Waymo’s Administrative Motion.

DATED: July 31, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By /s/ Charles K. Verhoeven

Charles K. Verhoeven
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